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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

RICHARD ZEITLIN, ADVANCED  
TELEPHONY CONSULTANTS, MRZ  
MANAGEMENT, LLC, DONOR  
RELATIONS, LLC, TPFE, INC.,  
AMERICAN TECHNOLOGY SERVICES,  
COMPLIANCE CONSULTANTS,  
CHROME BUILDERS CONSTRUCTION,  
INC., and UNIFIED DATA SERVICES,

Plaintiffs,

v.

BANK OF AMERICA, N.A. and JOHN  
and JANE DOES 1-100,

Defendants.

Case No. 2:18-cv-01919-RFB-DJA

**JOINT STIPULATION TO EXTEND  
REPLY DEADLINE ON MOTION TO  
COMPEL DISCOVERY  
(Third Request)**

Pursuant to Local Rule IA 6-1, Plaintiffs Richard Zeitlin, Advanced Telephony Consultants, MRZ Management, LLC, Donor Relations, LLC, TPFE, Inc., American Technology Services, Compliance Consultants, Chrome Builders Construction, and Unified Data Services, (hereinafter the "Plaintiffs"), and the Defendant Bank of America (hereinafter "BANA"), by and through their respective attorneys of record, hereby jointly stipulate to modestly extend the Plaintiffs' deadline to file a Reply in support of the Motion to Compel. This is the third joint stipulation requesting an

1 extension of time to extend the deadlines in the briefing schedule involving the Plaintiffs' Motion to  
 2 Compel. In support thereof, the Plaintiffs and BANA represent as follows:

3 In BANA's opposition brief, BANA represented that it was amenable to "provide the requested  
 4 supplement" and to "amend its responses to Plaintiffs' RFPs to provide reasonable additional detail to  
 5 its understanding of which documents are responsive to which requests." (Doc. 62, p. 19.) A review  
 6 of these documents and amendments may moot portions of the Motion to Compel, and if that's the  
 7 case, the Plaintiffs would like to note that fact in the Reply Brief. Additional time is necessary to  
 8 exchange and review those documents.

9 Accordingly, the Parties agree that the foregoing constitutes good cause to extend the deadline  
 10 to file the Reply Brief. This is the Parties' third request for an extension of the deadline related to the  
 11 Motion to Compel. The Parties agree that the requested extension will not prejudice any Party. No  
 12 deadline for which an extension is requested herein has expired.

13 Accordingly, the Parties agree there is good cause for entry of the following new deadline:  
 14 Plaintiffs time to file Reply papers in further support of the Motion to Compel is extended from July  
 15 2, 2020 to July 13, 2020.

16 **IT IS SO STIPULATED.**

17 Dated: June 29, 2020  
 18 THE BERNHOFT LAW FIRM, S.C.

19 /s/ Daniel J. Treuden  
 20 Daniel J. Treuden, Esq.  
 21 Wisconsin Bar No. 1052766  
 22 1402 E. Cesar Chavez Street  
 23 Austin, Texas 78702

24 Attorney for Plaintiffs  
 25 Appearing *pro hac vice*

Dated: June 29, 2020  
 SNELL & WILMER, L.L.P.

26 /s/ Kiah D. Beverly-Graham  
 27 Amy F. Sorenson (NV Bar 12495)  
 28 Blakeley E. Griffith, Esq. (NV Bar 12386)  
 Kiah D. Beverly-Graham (NV Bar 11916)  
 3883 Howard Hughes Pkwy, Ste. 1100  
 Las Vegas, Nevada 89169

*Attorneys for Bank of America, N.A.*

29 IT IS SO ORDERED:

30   
 31 \_\_\_\_\_  
 32 UNITED STATES MAGISTRATE JUDGE

33 Dated: June 30, 2020

**Certificate of Service**

I hereby certify that on June 29, 2020, I electronically filed and served the foregoing  
JOINT STIPULATION TO EXTEND REPLY DEADLINE ON MOTION TO COMPEL  
DISCOVERY with the Clerk of the Court for the United States District Court for the District of  
Nevada using the CM/ECF system.

/s/ Daniel J. Treuden

Daniel J. Treuden  
Attorney for Plaintiffs